



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 30, 2022

BY ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

**Re: *United States v. Joshua Adam Schulte*,
S3 17 Cr. 548 (JMF)**

Dear Judge Furman:

The Government writes in response to the Court's order, dated August 26, 2022, directing the Government to provide an update regarding the review of the defendant's laptop pursuant to a search warrant (the "Warrant") issued by a magistrate judge in the Eastern District of New York for the search and seizure of the defendant's laptop. The Government's review of the laptop remains ongoing. Pursuant to the terms of the Warrant, law enforcement agents separate from the prosecution team (the "Wall Team") have conducted a forensic extraction of the data of the laptop. The Government understands that a portion of that data has been decrypted and is currently undergoing substantive review by the Wall Team, but that a substantial volume of additional data is still undergoing decryption and technical processing necessary before it can be reviewed.

In order to facilitate the defendant's preparation of his post-trial motions during the pendency of that review, the Government has sent to the defendant copies of the trial transcripts, exhibits, and unclassified 18 U.S.C. § 3500 material on CDs, which the Government has confirmed with the Metropolitan Detention Center that the defendant will be able to view and access on the law library computer currently available to him. The Government has also requested that the Wall Team make available to defense counsel a copy of the extracted image of the defendant's laptop, and the Government understands that the Wall Team is currently determining how large a hard drive defense counsel will need to provide in order to receive that data.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
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cc: Defense Counsel (by ECF)